United States District Court Southern District of New York

PIERRE LAGRANGE AND G&S TRUSTEES LIMITED, INDIVIDUALLY AND AS ASSIGNEES OF JAIME FRANKFURT AND JAIME FRANKFURT, LLC

PLAINTIFFS,

-AGAINST-

KNOEDLER GALLERY, LLC D/B/A KNOEDLER & COMPANY, AND ANN FREEDMAN,

DEFENDANTS.

ECF CASE

11 Civ. 8757 (PGG)

NOTICE OF MOTION

PLEASE TAKE NOTICE that Defendant Ann Freedman, by and through her counsel, Boies, Schiller & Flexner LLP, and upon the accompanying Memorandum of Law and the Declarations of Luke Nikas, Stephen Polcari, and E.A. Carmean Jr., will move this Court, at a date and time to be determined by the Court, for an order dismissing with prejudice the claims against her in Plaintiffs' Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6).

Dated: May 14, 2012

BOIES, SCHILLER & FLEXNER LLP

Nicholas A. Gravante, Jr. 575 Lexington Avenue New York, New York 10022 (212) 446-2300

Philip J. Iovieno Luke Nikas Benjamin D. Battles 10 North Pearl Street Albany, New York 12207 (518) 434-0600

Attorneys for Defendant Ann Freedman